



HELEN F. DALTON & ASSOCIATES, P.C.
ATTORNEYS AT LAW

80-02 Kew Gardens Road, Suite 601
Kew Gardens, New York 11415
Tel.: (718) 263-9591

May 2, 2022

Via ECF:

The Honorable John P. Cronan, U.S.D.J.
United States District Judge
Southern District Of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Courtroom 12D
New York, New York 10007
CronanNYSDChambers@nysd.uscourts.gov

Re: **Penate v. Leo's Bagels Hanover Square LLC, et al.**
Docket No. 1:21-cv-10934 (JPC)

Dear Judge Cronan:

This office represents Plaintiff in the above-referenced matter and we respectfully submit this letter motion jointly with Defendants to respectfully request an extension of time to file the parties' settlement agreement and motion for settlement approval. The parties request a two-week extension to file the aforementioned documents. If this request is granted, the parties can file on or before May 16, 2022.

The parties have finalized the settlement agreement and are in the process of obtaining clients' signatures as well as finalizing the motion for approval of the agreement. As such, we ask the Court for two weeks to submit a final motion for approval and fully executed agreement for the Court's review.

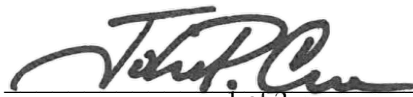
This is the first request for an extension of this deadline and this request will not affect any other dates or deadlines.

We thank the Court for its consideration and remain available to provide any additional information.

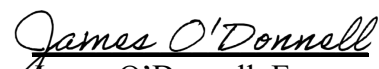
The parties' request is granted. The parties shall submit any settlement requiring Court approval under *Cheeks v. Freeport Pancake House*, 796 F.3d 199 (2d Cir. 2015), and any other necessary information, by May 16, 2022.

SO ORDERED.

Date: May 3, 2022
New York, New York


JOHN P. CRONAN
United States District Judge

Respectfully submitted,


James O'Donnell, Esq.